

Summary of "ex-parte" telephone conference call with FCC personnel:

Date: Tuesday, November 28, 2006. Approximately 1 hour starting at 2:00 PM EST.

Participants:

Jeff Tobias, Tim Maguire and Ghassan Khalek, FCC.

Owen Anderson and Kurt Anderson, GMDSS Instructors, Pacific Maritime Institute, Seattle - WA.

Subject: FCC WT Docket 00-48, PR Docket No. 92-257, FCC-06-129 issued Sept. 8, 2006.

1- 80.409: (a)(1)(2) Correcting electronic logs. We indicated that the strikethrough does not likely present a problem but we are not aware of any software function to provide a "dated electronic signature."

2- We suggested that the purpose of a log is to record data observed or action taken. We recommended that the rules governing what data should be observed and what action should be taken should be listed elsewhere under the appropriate subpart.

3- We suggested that the rules governing equipment testing are fragmented and conflicting. We recommended that there should be a single comprehensive testing rule, which lists all compulsory required equipment and the intervals for testing and that it could be listed under 80.101, 80.409 or Subpart-W. We recommended that all GMDSS tests and log-keeping be listed under Subpart-W.

4- We suggested that rules applying to log entries for distress communications could still be improved. We stated that the current wording is welcome, as it will result in a significant reduction in the log-keeping burden. We also stated that the rules in Subpart W governing response to DSC Distress Alerts are an improvement but do not yet fully account for the problems confronting the watch officer in actuality and recommended that more specific language is needed to provide additional clarity.

5- We sought and received guidance on the procedures for submitting information into the docket of this proceeding.

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